

REMARKS

Reconsideration is respectfully requested.

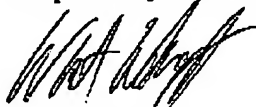
Claim 32 was objected to based on the informal matter of reciting dependency from claim 29 rather than claim 31. Claims 31 and 32 were rejected under 35 U.S.C. 102, or in the alternative under 35 U.S.C. 103(a), as being anticipated by applicants' disclosure in Fig. 2 and as described at page 2, paragraph 2 of the specification.

By the present amendment, claim 32 has been amended to recite dependency from claim 31. Claim 31 has been amended to recite that "a hardbaked resist structure and one or more additional structures containing other materials having comparatively higher surface energy, said structures having a substantially even surface profile as a result of being simultaneously planarized according to a planarization process" [Emphasis added]. This distinguishes the claimed product from the cited art because that art is reported at page 3, lines 10-14 of the specification as having "an uneven surface profile, particularly between the hardbaked resist and copper structures, and between the hardbaked resist and alumina structures." Given these differences, there can be no anticipation under 35 U.S.C. 102. Nor would the product of claim 31 have been obvious under 35 U.S.C. 103 insofar as there is no teaching or suggestion in the cited art as to how to provide the claimed "substantially even surface profile."

In view of the foregoing, Applicant respectfully requests that all rejections be withdrawn and that Notices of Allowability and Allowance be duly issued.

Applicants direct attention to the **CHANGE OF CORRESPONDENCE ADDRESS** form enclosed herewith, and request that the undersigned representative's new address information be entered into the file wrapper. The undersigned is named in the original Declaration/Power of Attorney filed with the subject application on January 14, 2002.

Respectfully submitted,



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